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Hearing Date: May 20, 2015 at 10:00 a.m.

Objection Deadline: May 13, 2015 at 5:00 p.m.

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and
the estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

DAWN PASCUCCI BARNARD,

TRUST FBO MICHAEL A. PASCUCCI UA DTD
12/31/94 MICHAEL C PASCUCCI
CHRISTOPHER S PASCUCCI,

MICHAEL A. PASCUCCI,

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04459 (SMB)

MICHAEL C. PASCUCCI,
CHRISTOPHER S. PASCUCCI,
RALPH P. PASCUCCI,
PASCUCCI FAMILY FOUNDATION,
JOCELYN A. PASCUCCI,
CHRISTOPHER S. PASCUCCI 1995
CHARITABLE REMAINDER TRUST UAD
11/7/95,
THE DAWN A. PASCUCCI BARNARD 1995
CHARITABLE REMAINDER TST UAD 11/7/95,
FUND FOR THE POOR, INC.,
CSP INVESTMENT ASSOCIATES LLC,
RPP INVESTMENT ASSOCIATES LLC, and
MCP INVESTMENT ASSOCIATES LLC,

Defendants.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

JD PARTNERS LLC, JOHN A. DANZI,
DEBORAH DANZI, and JANICE DANZI
SENNELLO,

Defendants.

Adv. Pro. No. 10-04461 (SMB)

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

MAF ASSOCIATES, LLC,
MARK A. FREEMAN, and
FRANCINE FREEMAN,

Defendants.

Adv. Pro. No. 10-05235 (SMB)

**NOTICE OF MOTION FOR ENTRY OF AN ORDER PURSUANT TO SECTION 105(a)
OF THE BANKRUPTCY CODE AND RULES 2002 AND 9019 OF THE FEDERAL
RULES OF BANKRUPTCY PROCEDURE APPROVING A SETTLEMENT BY AND
AMONG THE TRUSTEE AND DAWN PASCUCCI BARNARD, TRUST FBO MICHAEL
A. PASCUCCI UA DTD 12/31/94, MICHAEL A. PASCUCCI, MICHAEL C. PASCUCCI,
CHRISTOPHER S. PASCUCCI, RALPH P. PASCUCCI, PASCUCCI FAMILY
FOUNDATION, JOCELYN A. PASCUCCI, CHRISTOPHER S. PASCUCCI 1995
CHARITABLE REMAINDER TRUST UAD 11/7/95, THE DAWN A. PASCUCCI
BARNARD 1995 CHARITABLE REMAINDER TST UAD 11/7/95, FUND FOR THE
POOR, INC., CSP INVESTMENT ASSOCIATES LLC, RPP INVESTMENT
ASSOCIATES LLC, MCP INVESTMENT ASSOCIATES LLC, JD PARTNERS LLC,
JOHN A. DANZI, DEBORAH DANZI, JANICE DANZI SENNELLO,
MAF ASSOCIATES, LLC, MARK A. FREEMAN AND FRANCINE FREEMAN**

TO: THE HONORABLE STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE

PLEASE TAKE NOTICE that Irving H. Picard (the “Trustee”), as trustee for the liquidation of Bernard L. Madoff Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa-lll, and the substantively consolidated estate of Bernard L. Madoff (“Madoff”), by and through his undersigned counsel, will move before the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, at the United States Bankruptcy Court, the Alexander Hamilton Customs House, One Bowling Green, New York, New York 10004, on May 20, 2015 at 10:00 a.m., or as soon thereafter as counsel may be heard, seeking entry of an order, pursuant to section 105(a) of the United States Bankruptcy Code and Rules

2002 and 9019 of the Federal Rules of Bankruptcy Procedure, approving a certain settlement agreement by and among the Trustee and Dawn Pascucci Barnard, Trust FBO Michael A. Pascucci UA DTD 12/31/94, Michael A. Pascucci, Michael C. Pascucci, Christopher S. Pascucci, Ralph P. Pascucci, Pascucci Family Foundation, Jocelyn A. Pascucci, Christopher S. Pascucci 1995 Charitable Remainder Trust UAD 11/7/95, The Dawn A. Pascucci Barnard 1995 Charitable Remainder Tst UAD 11/7/95, Fund for the Poor, Inc., CSP Investment Associates LLC, RPP Investment Associates LLC, MCP Investment Associates LLC, JD Partners LLC, John A. Danzi, Deborah Danzi, Janice Danzi Sennello, MAF Associates, LLC, Mark A. Freeman and Francine Freeman (collectively, the “Transferees”; each of the Trustee and Transferees a “Party” and collectively, the “Parties”), as more particularly set forth in the motion annexed hereto (the “Motion”).

PLEASE TAKE FURTHER NOTICE that written objections to the Motion must be filed with the Clerk of the United States Bankruptcy Court, One Bowling Green, New York, New York 10004 by no later than **5:00 p.m. on May 13, 2015** (with a courtesy copy delivered to the Chambers of the Honorable Stuart M. Bernstein) and must be served upon (a) Baker & Hostetler LLP, 45 Rockefeller Plaza, New York, New York 10111, Attn: Keith R. Murphy and Nicholas J. Cremona; (b) King & Spalding, 1185 Avenue of the Americas, New York, NY 10036, Attn: Arthur J. Steinberg and Scott Davidson; and (c) Securities Investor Protection Corporation, 805 Fifteenth Street, N.W., Suite 800, Washington D.C. 20005, Attn: Kevin Bell. Any objections must specifically state the interest that the objecting party has in these proceedings and the specific basis of any objection to the Motion.

PLEASE TAKE FURTHER NOTICE that failure to file timely objections may result in the entry of an order granting the relief requested in the Motion without further notice to any party or an opportunity to be heard.

Dated: April 24, 2015
New York, NY

s/Nicholas J. Cremona
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